

Mark W. Harmon
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ATTORNEYS FOR FORD MOTOR CREDIT COMPANY LLC

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
LUBBOCK DIVISION

IN RE:	§	
	§	
REAGOR-DYKES MOTORS, LP	§	CASE NO. 18-50214-RLJ-11
	§	
	§	
DEBTOR(S)	§	

**NOTICE OF APPEARANCE AND REQUEST
FOR SERVICE OF PAPERS**

PLEASE TAKE NOTICE that BOERNER, DENNIS & FRANKLIN, PLLC, by and through the undersigned, hereby makes an appearance on behalf of **FORD MOTOR CREDIT COMPANY LLC ("FMCC")** and pursuant to Federal Rules of Bankruptcy Procedure 2002, 3017, 9007, and 9010 and 11 U.S.C. § 1109(b), requests that copies of any and all notices, pleadings, motions, orders to show cause, applications, presentments, petitions, memoranda, affidavits, declarations, orders, disclosure statements and plans of reorganization, or other documents, filed or entered in this case, be transmitted to:

Mark W. Harmon
BOERNER, DENNIS & FRANKLIN, PLLC
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Lubbock, Texas 79408
E-mail: mwharmon@bdfllawfirm.com

PLEASE TAKE FURTHER NOTICE that the foregoing request includes, without limitation, motions, applications, complaints, demands, notices of motions, notices of applications, notices of hearing, petitions, objections, answers, responses, replies, claims, schedules, statements, operating reports, plans, disclosure statements, and all other pleadings, requests or notices, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, other commercial carrier, hand delivery, facsimile, telegraph, telex, e-mail, telephone or otherwise.

PLEASE TAKE FURTHER NOTICE that this Notice of Appearance shall neither constitute nor be deemed or construed as FMCC's:

- (a) waiver of the right to have final orders in non-core matters entered only after de novo review by the United States District Court;
- (b) waiver of the right to trial by jury in any proceeding to which such right exists in the Bankruptcy Case or in any case, controversy, or proceeding related to the Bankruptcy Case;
- (c) waiver of the right to have the United States District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal;
- (d) waiver of the right to contest jurisdiction or appropriate venue in the Bankruptcy Case or in any related proceeding; or
- (e) waiver of any other rights, claims, actions, defenses, setoffs or recoupments which FMCC has or may hereafter obtain, in law or in equity, all of which rights, claims, actions, defenses, setoffs and recoupments FMCC hereby expressly reserves.

Respectfully submitted,

/s/ Mark W. Harmon

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CERTIFICATE OF SERVICE

I, Mark W. Harmon, hereby certify that on this 7th day of August, 2018, a true and correct copy of the above and foregoing instrument has either been served electronically or by United States mail, postage prepaid, to each of the following listed parties:

United States Trustee
Room 976
1100 Commerce Street
Dallas, Texas 75242

David R. Langston
Brad W. Odell
Mullin Hoard & Brown, L.L.P.
P.O. Box 2585
Lubbock, Texas 79408

All parties in interest registered with
the U.S. Bankruptcy Court to receive
electronic notices in this case.

/s/ Mark W. Harmon

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